

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Report	2	2nd paragraph and FN 3	7/13/2020 - 7/27/2020	Assistant U.S. Attorney Zachary G. Bannon, Assistant U.S. Attorney Christopher K. Connolly, Assistant U.S. Attorney Elizabeth J. Kim ("Government attorneys"); U.S. Department of Homeland Security ("DHS") attorneys [REDACTED], Ketan Bhirud, Rene Browne; U.S. Customs and Border Protection ("CBP") attorneys, [REDACTED] Honors Attorney [REDACTED]; CBP Office of Field Operations ("OFO") officials Pete Acosta, [REDACTED], Donald Conroy, [REDACTED]; CBP Office of Information Technology ("OIT") officials Valerie Isbell, [REDACTED] Jim McLaughlin, [REDACTED]; Acting Deputy Chief of Staff for the Commissioner [REDACTED] and Border Patrol official [REDACTED]	High level summary of a series of email communications regarding CBP's access to the DMV data of various states and jurisdictions through Nlets and the research conducted by CBP OIT to determine the extent of such access. Includes the findings of research conducted by CBP OIT.	ACP/WP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, at the request of Government attorneys for the purpose of responding to arguments in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and in Opposition to Defendants' Motion for Partial Summary Judgment ("Plaintiffs' brief"). The communications and research were conveyed to CBP attorneys and Government attorneys for the purposes of obtaining legal advice in this litigation.
Report	2	FN 4	7/13/20 - 7/24/20	Government attorneys; DHS attorney [REDACTED]; CBP attorneys [REDACTED]; CBP OFO officials [REDACTED], Pete Acosta, [REDACTED] and CBP OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]	High level summary of a series of email communications regarding CBP's access to the DMV data of various states and jurisdictions through Nlets and the research conducted by CBP OIT to determine the extent of such access. Includes the findings of research conducted by CBP OIT.	ACP/WP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, at the request of Government attorneys for the purpose of responding to arguments in Plaintiffs' brief. The communications and research were conveyed to CBP attorneys and Government attorneys for the purposes of obtaining legal advice in this litigation.
Report	3	1st paragraph	8/27/2020	Associate U.S. Attorney John McEnany; DHS attorneys [REDACTED], Ketan Bhirud; and CBP attorneys Bennett Courey, [REDACTED]	statement summarizing a portion of a telephone communication reflecting the relevance of CLETS Subscriber Agreements to the litigation	WP	Reflects personal opinions, thoughts, and impressions of Associate U.S. Attorney and agency attorneys related to the preparation of arguments and filings in this litigation.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Report	4	2nd paragraph	7/13/2020 - 7/24/2020	Government attorneys; CBP attorneys [REDACTED]; CBP OFO officials Pete Acosta, [REDACTED]; and CBP OIT officials: Valerie Isbell, [REDACTED] Jim McLaughlin	Overview of a series of email communications and a telephone communication regarding the sensitivity level of certain TECS codes in the administrative record.	ACP/WP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, which were conveyed to CBP attorneys and Government attorneys for the purposes of determining litigation strategy and obtaining legal advice in this litigation.
Report	4	3rd paragraph	6/11/2020 - 6/17/2020; 7/30/2020	Associate U.S. Attorney John McEnany; DHS attorney [REDACTED] and CBP attorneys [REDACTED]	Overview of series of email and telephone communications between Associate U.S. Attorney McEnany and CBP attorneys, CBP attorneys and CBP OIT officials, and CBP attorneys and CBP OFO officials, regarding the sensitivity level of certain TECS codes in the administrative record.	ACP/ WP	Attorney-client communications reflecting recommendations and legal advice from Associate U.S. Attorney McEnany and CBP attorneys. Communications made, documents prepared, and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, for the purpose of responding to the Court's July 29, 2020 and August 11, 2020 orders ("Court's orders").
Report	6	1st full paragraph	7/13/2020; 7/13/2020 - 7/24/2020	CBP attorneys Scott Falk, Bennett Courey, [REDACTED]; CBP Deputy Commissioner Robert E. Perez; CBP OFO Officials Pete Acosta, [REDACTED] Donald Conroy, [REDACTED] and OIT officials Valerie Isbell, [REDACTED] Jim McLaughlin, [REDACTED]	High level summary of series of email communications between CBP attorneys and CBP Deputy Commissioner Perez regarding CBP's access to DMV information; email and telephone communications between CBP attorneys and CBP OIT and OFO officials regarding CBP's access to the DMV data of various states and territories through Nlets and the research conducted by CBP OIT to determine the extent of such access. Includes the findings of research conducted by CBP OIT.	ACP/WP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, at the request of Government attorneys for the purpose of responding to arguments in Plaintiffs' brief. The communications and research were conveyed to CBP attorneys and Government attorneys for the purposes of obtaining legal advice in this litigation.
Report	6	2nd paragraph	NA	NA	NA	LEP	Law enforcement investigative techniques and procedures related to vetting of Trusted Traveler Program applicants

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Report	7	2nd paragraph	7/13/2020 - 8/5/2020	CBP attorneys [REDACTED] CBP OFO officials Pete Acosta, [REDACTED], Donald Conroy, [REDACTED]; and CBP OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]	Statement reflective of various email and telephone communications regarding restrictions under California laws	WP	Statement reflects research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, and facts developed, for the purpose of responding to the Court's orders.
Report	12	1st partial paragraph	8/27/2020	Associate U.S. Attorney John McEnany; DHS attorney [REDACTED] and CBP attorneys Bennett Courey, [REDACTED], [REDACTED]	Statement summarizing portion of a telephone communication in relation to the preparation of Government's September 4 report ("Government's Report").	ACP	Attorney/client communications between Associate U.S. Attorney McEnany and DHS and CBP attorneys for the purposes of obtaining legal advice and responding to the Court's orders.
Report	12	2nd paragraph; 4th sentence	12/14/2019 - 2/19/2020	CBP attorneys Bennett Courey, [REDACTED] CBP OFO officials Todd Owen, [REDACTED] John Wagner, [REDACTED], Pete Acosta, Donald Conroy, [REDACTED]; and CBP OIT officials Phil Landfried, [REDACTED], Valerie Isbell, [REDACTED], Sonny BHAGOWALIA	Overview of a series of email and telephone communications regarding research conducted by CBP OIT on CBP's access to DMV data.	ACP/DPP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, which were conveyed to CBP attorneys and Government attorneys for the purposes of determining litigation strategy, obtaining legal advice, and considering the possibility of settlement in this litigation. The communications and research were also conveyed to DHS and CBP officials for the purpose of considering potential policy responses to New York's April 3, 2020 amendment to the Green Light Law.
Report	12	2nd paragraph 5th and 6th sentence	2/14/2019 - 2/19/2020; 4/2020	CBP attorneys Bennett Courey, [REDACTED]; CBP OFO officials Pete Acosta, Donald Conroy, [REDACTED]; and CBP OIT officials Valerie Isbell, [REDACTED] Jim McLaughlin, [REDACTED]; Deputy Commissioner Robert Perez.	Overview of a series of email communications between CBP attorneys and CBP OIT officials, and CBP attorneys and CBP OFO officials, related to New York's April 3, 2020 amendment to the Green Light Law, research conducted by CBP OIT on CBP's access to DMV data, and CLETS subscriber agreements.	DPP	Communications made and research conducted by CBP OIT officials, which were conveyed to CBP officials for the purpose of considering potential policy responses to New York's April 3, 2020 amendment to the Green Light Law. The communications and research also reflect the internal thoughts, personal opinions, and recommendations of CBP officials.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Report	12	2nd paragraph; 8th sentence	2/10/2020 - 6/21/2020	Government attorneys; CBP attorneys [REDACTED]; DHS attorneys [REDACTED], Rene Browne	High level statement about a series of email communications and telephone communications between Government attorneys and CBP and DHS attorneys related to New York's April 3, 2020 amendment to the Green Light Law and CBP's access to DMV data.	ACP	Communications between Government attorneys and CBP and DHS attorneys for the purposes of determining litigation strategy, obtaining legal advice, and considering the possibility of settlement in this litigation.
Report	12	4th paragraph; 2 6th sentence	2/11/2020	Government attorneys; CBP attorneys [REDACTED]; DHS attorneys [REDACTED]	Summary of email communication provided to Government attorneys reflecting DHS and CBP's understanding of the facts when Acting Secretary Wolf's February 5, 2020 decision (the "TTP decision") was issued.	ACP	Communication from CBP and DHS provided to Government attorneys for the purposes of obtaining legal advice in the anticipation of litigation.
Report	12, 13	4th paragraph, 7th sentence (cont. on p. 13)	2/14/2020	DOJ attorneys Charles Roberts, Dena Roth, Government attorneys; CBP attorneys [REDACTED]; DHS attorneys [REDACTED]	Summary of an email communication reflecting responses to questions from Department of Justice attorneys related to the TTP decision.	ACP/WP	Communication between Department of Justice attorneys and CBP and DOJ, which were provided to Government attorneys for the purposes of obtaining legal advice in litigation.
Report	13	2nd paragraph	Apr-20	Government attorneys; CBP attorneys [REDACTED]; DHS attorneys [REDACTED]	High level summary of a series of email and telephone communications between Government attorneys and CBP and DHS attorneys related to the preparation of the administrative record. Includes description of information included in the draft administrative record.	ACP/WP	Communications between Government attorneys and CBP and DHS attorneys, which reflect legal advice, opinions, and mental impressions of attorneys, information collected and compiled for the purposes of preparing filings in this litigation.
Report	13	3rd paragraph	April 2020 - June 2020	Government attorneys; CBP attorneys [REDACTED]; DHS attorney [REDACTED]	Statement regarding multiple email communications between Government attorneys and CBP and DHS attorneys throughout the pendency of this litigation regarding arguments made by the Government on behalf of CBP and DHS.	ACP/WP	Communications between Government attorneys and CBP and DHS attorneys, which were provided for the purposes of determining litigation strategy, obtaining legal advice, and preparing filings in this litigation.

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Report	13, 14	FN11 (cont. p. 14)	6/19/2020; 8/27/2020	Associate U.S. Attorney McEnany, DHS attorney [REDACTED]; and CBP attorneys [REDACTED]	Summary of internal email communications between DHS counsel and CBP counsel regarding the Government's motion for summary judgment, including discussion of CBP's access to DMV data; the footnote further describes the summary of a telephone communication between CBP and DHS attorneys and Associate U.S. Attorney McEnany that took place on August 27, 2020 to discuss an email communication from June 19, 2020.	ACP/WP	Attorney/client communications between Associate U.S. Attorney McEnany and DHS and CBP attorneys for the purposes of obtaining legal advice and in preparation of the Government's Report. Communications between CBP and DHS attorneys, which reflect legal advice, opinions, and mental impressions of attorneys, and which were conveyed to Government attorneys for the purposes of preparing filings in this litigation.
Report	14	2nd paragraph	April 2020 - May 2020	CBP attorneys Bennett Courey, Scott Falk, [REDACTED] Acting Commissioner Mark Morgan, Deputy Commissioner Robert Perez, CBP Commissioner's Office officials Debbie Seguin, [REDACTED]; CBP OFO officials Todd Owen, John Wagner, [REDACTED] Pete Acosta, [REDACTED]; CBP Border Patrol officials Rodney Scott, Raul Ortiz, [REDACTED]; CBP OIT official Valerie Isbell; CBP Policy Directorate officials Surya Gunasekara, [REDACTED] and DHS officials John Gountanis, James McCament, Angelica Alfonso Royals, David Dorey; Acting Director of ICE - Matthew Albence; ICE official Christopher Kelly, [REDACTED]; DHS Attorneys Chad Mizelle, Joseph Maher, Rene Browne, [REDACTED]	Statement summarizing multiple email communications about potential responses to New York's April 3, 2020 amendment to the Green Light.	ACP/DPP	Communications between CBP and DHS counsel and CBP and DHS officials for the purpose of considering potential policy responses to New York's April 3, 2020 amendment to the Green Light Law. These communications were also conveyed to Government attorneys for the purposes of determining litigation strategy, obtaining legal advice, and considering the possibility of settlement in this litigation.
Report	14	3rd paragraph	6/11/2020 - 6/17/2020	Government attorneys; CBP attorneys [REDACTED]; OFO officials Pete Acosta, [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED], Alma Cole	Overview of a series of email communications and a telephone communication regarding the sensitivity level of certain TECS codes in the administrative record.	ACP/WP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, which were conveyed to CBP attorneys and Government attorneys for the purposes of determining litigation strategy and obtaining legal advice in this litigation.

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Report	15	IV. A	7/13/2020 - 7/27/2020	Government attorneys; DHS attorneys Ketan Bhirud, [REDACTED]; CBP attorneys [REDACTED]; CBP OIT officials [REDACTED], Pete Acosta, [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED] Jim McLaughlin, [REDACTED]	High level summary of a series of email communications regarding CBP's access to the DMV data of various states and jurisdictions through Nlets and the research conducted by CBP OIT to determine the extent of such access. Includes the findings of research conducted by CBP OIT.	ACP/WP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, at the request of Government attorneys for the purpose of responding to arguments in Plaintiffs' brief. The communications and research were conveyed to CBP attorneys and Government attorneys for the purposes of obtaining legal advice in this litigation.
Report	15, 16	IV. B	6/13/2020 - 6/17/2020; 8/5/2020 - 8/12/2020	Government attorneys; Associate U.S. Attorney McEnany; DHS attorney [REDACTED], Ketan Bhirud; CBP attorneys [REDACTED]; CBP OFO officials Pete Acosta, [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED] Jim McLaughlin	Overview of a series of email communications and a telephone communication regarding the sensitivity level of certain TECS codes in the administrative record.	ACP/WP	Communications made and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, which were conveyed to CBP attorneys and Government attorneys for the purposes of determining litigation strategy and obtaining legal advice in this litigation. Attorney/client communications reflecting recommendations and legal advice from Associate U.S. Attorney McEnany and CBP attorneys. Communications made, documents prepared, and research conducted by CBP attorneys, CBP OIT officials, and CBP OFO officials, for the purpose of responding to the Court's orders.
Acosta declaration	5	7	6/12/20-6/19/20	Declarant Pete R. Acosta, the Director of Trusted Traveler Programs (the "Director"); CBP attorneys [REDACTED]; CBP OFO officials [REDACTED]; CBP OIT officials Valerie S. Isbell, [REDACTED]	Summary of series of email communications from June 12, 2020 to June 19, 2020, including legal advice in the context of the Director's first declaration in this litigation, signed on June 19, 2020.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys, the Director, and other CBP officials whom the Director relied upon as subject matter experts. Contains the Director's mental impressions, conclusions, and opinions during the drafting and ultimate signing of his prior declaration filed in this litigation, which incorporated legal advice provided by CBP attorneys.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Acosta declaration	5	8	2/10/2020 - 2/19/2020	The Director; CBP attorneys [REDACTED] [REDACTED] CBP OFO officials Todd Hoffman, [REDACTED]; CBP OIT officials Valerie S. Isbell, [REDACTED]	Summary of a series of email communications regarding CBP's access to the DMV data of various jurisdictions through Nlets and research conducted by CBP OIT to determine the extent of such access. Includes findings of research conducted by CBP OIT and explanation of what the Director believed was true up to June 19, 2020 and September 4, 2020 regarding CBP's access to NY DMV information.	WPP	Contains the Director's mental impressions, conclusions, and opinions related to the content of his prior declaration filed in this litigation
Acosta declaration	5	9	6/12/2020-6/19/2020	The Director; CBP attorneys [REDACTED] [REDACTED] CBP OFO officials [REDACTED], Todd Hoffman, [REDACTED]; CBP OIT officials Valerie S. Isbell, [REDACTED]	Summary of a series of email communications regarding drafting of Director's declaration, by and between CBP attorneys, the Director, and other CBP officials whom the Director relied upon as subject matter experts, from June 12, 2020 to June 19, 2020.	ACP/WPP	Description and content of confidential communications, including legal advice in the context of the Director's first declaration in this litigation, signed on June 19, 2020. Contains the Director's mental impressions, conclusions, and opinions during the drafting and ultimate signing of his prior declaration filed in this litigation.
Acosta declaration	6	10	6/12/2020-6/19/2020	The Director; CBP attorneys [REDACTED] [REDACTED] CBP OFO officials [REDACTED]; CBP OIT officials Valerie S. Isbell, [REDACTED]	Summary of a series of email communications regarding CBP's access to various states' DMV data through Nlets and research conducted by CBP OIT to determine the extent of such access. Includes findings of research conducted by CBP OIT.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys, the Director, and other CBP officials whom the Director relied upon as subject matter experts, from June 12, 2020 to June 19, 2020, including to whom, why, and what he discussed in the preparation and drafting of his first declaration in this litigation, signed on June 19, 2020. Contains the Director's mental impressions, conclusions, and opinions during the drafting and ultimate signing of his prior declaration filed in this litigation.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Acosta declaration	6	11	6/12/2020-6/15/2020	the Director; CBP attorneys [REDACTED] [REDACTED]; CBP OFO officials [REDACTED]; CBP OIT officials Valerie S. Isbell, [REDACTED] [REDACTED]	Summary of a series of email communications regarding drafting of Director's declaration.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys, the Director, and other CBP officials he relied upon as subject matter experts, from June 12, 2020 to June 19, 2020, including to whom, why, and what he discussed in the preparation and drafting of his first declaration in this litigation, signed on June 19, 2020. Contains the Director's thought process and description of communications leading up to June 15, 2020 in drafting of his first declaration.
Acosta declaration	6-7	12	6/12/2020-6/19/2020	The Director; CBP OFO officials [REDACTED] [REDACTED] CBP attorneys [REDACTED] [REDACTED]	Summary of a series of email communications regarding drafting of Director's declaration.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys and the Director, including counsel's advice and the rationale that the Director considered in deciding to sign his first declaration on June 19, 2020. Contains the Director's mental impressions and thought process in reviewing and signing his first declaration filed in this litigation, which incorporated legal advice provided by CBP attorneys.
Acosta declaration	7	13	6/19/2020	The Director; CBP attorneys [REDACTED] [REDACTED]	Summary of series of email communications regarding drafting of Director's declaration	ACP/WPP	Description and content of confidential communications o by and between CBP agency counsel, the Director of Trusted Traveler Programs, and other CBP officials the Director relied upon, including the subject matter discussed in the Director's final review of his declaration. Contains the Director's mental impressions and thought process in reviewing and signing his first declaration, which incorporated legal advice provided by CBP attorneys
Acosta declaration	7	14	7/13/2020-7/17/2020	The Director; CBP attorneys [REDACTED] [REDACTED]; CBP OFO officials [REDACTED] [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED] [REDACTED]	Summary of series of email communications regarding Plaintiffs allegations in their response brief regarding CBP's access to various states' DMV data.	ACP/WPP	Description and content of confidential communications by and between CBP attorneys, the Director, and other CBP officials whom the Director relied upon as subject matter experts. Contains the Director's mental impressions and thought process in reviewing and signing his first declaration on June 19, 2020, which incorporated legal advice provided by CBP attorneys.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Acosta declaration	7-8	15	7/13/2020-7/17/2020	The Director; CBP attorneys [REDACTED]; CBP OFO officials [REDACTED], Vernon T. Foret, [REDACTED] CBP OIT officials Valerie Isbell, [REDACTED]	Summary of a series of email communications regarding CBP access to the DMV data of various states and territories through Nlets and research conducted by CBP OIT to determine the extent of such access. Includes findings of research conducted by CBP OIT, which was performed in preparing a response to Plaintiffs' brief.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys, the Director, and other CBP officials whom the Director relied upon as subject matter experts, related to a request made by Government attorneys to inquire into claims made in Plaintiffs' brief. Contains the Director's thought process and description of communications and research conducted for purposes of filings in litigation.
Acosta declaration	8	16	7/17/2020	The Director; CBP attorneys [REDACTED] Bennett Courey; CBP OFO officials [REDACTED] Donald Conroy, [REDACTED] Todd Hoffman; and CBP OIT officials Valerie Isbell, [REDACTED]	Summary of a telephone communication regarding CBP's access to DMV data of various states and territories through Nlets and research conducted by CBP OIT to determine the extent of such access. Includes findings of research conducted by CBP OIT, which was performed in preparing a response to Plaintiffs' brief and which led to the Government's July 23, 2020 letter to correct the record.	ACP/WPP	Description and content of confidential communications, by and between CBP counsel, the Director, and Government attorneys, which were conveyed to Government attorneys for the purposes of determining litigation strategy and obtaining legal advice in this litigation.
Acosta declaration	8	17	7/24/2020	The Director, CBP OFO officials Todd Owen, Todd Hoffman, [REDACTED] Donald Conroy, [REDACTED], and CBP OIT officials Sonny Bhagowhalia, Benjamine Huffman, Samuel Grable, Valerie Isbell, [REDACTED]	Description of CBP OIT's ongoing efforts on July 24, 2020 in preparation for subsequent filing of the report, after the Government's correction letter to the Court, filed on July 23, 2020.	WPP	Description of CBP OIT's ongoing efforts on July 24, 2020 in preparation for subsequent filing, after the Government's correction letter to the Court, filed on July 23, 2020.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Acosta declaration	8-9	18	6/12/2020-6/19/2020; 7/13/2020-9/4/2020	The Director; CBP attorneys [REDACTED] [REDACTED] CBP OFO officials [REDACTED], Vernon T. Foret, [REDACTED] [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED]	Summary of a series of email communications regarding CBP's access to DMV data of various states and territories through Nlets and research conducted by CBP OIT to determine the extent of such access. Includes findings of research conducted by CBP OIT, which was performed in preparing a response to Plaintiffs' brief and which led to the Government's July 23, 2020 letter to correct the record.	ACP/WPP	Description and content of confidential communications by and between CBP attorneys, the Director, and CBP OIT subject matter experts upon whom the Director relied. Contains the Director's thought process and description of communications to him and research conducted before and after the Government's correction letter to the Court, filed on July 23, 2020.
Acosta declaration	9	19	7/30/2020	The Director; CBP Attorneys M. Bennett Courey, [REDACTED] [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED] [REDACTED], Jim McLaughlin; CBP OFO officials [REDACTED] [REDACTED] [REDACTED]; CBP Border Patrol official [REDACTED]; CBP AMO official [REDACTED]	Summary of teleconference regarding past declarations filed and continuing research being conducted by CBP in response to the Court's July 29, 2020 order.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys, the Director, and CBP OIT subject matter experts. Contains the Director's thought process and description of communications to him and research conducted before and after the Government's July 23, 2020 correction letter to the Court and during a teleconference on July 30, 2020.
Acosta declaration	10	20	N/A	N/A	N/A	LEP	law enforcement investigative techniques and procedures related to vetting of TTP applicants
Acosta declaration	10-11	21	N/A	N/A	N/A	LEP	law enforcement investigative techniques and procedures related to vetting of TTP applicants
Acosta declaration	11	23	7/30/2020-7/31/2020	The Director; CBP Attorneys M. Bennett Courey, [REDACTED] [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED] [REDACTED], Jim McLaughlin; CBP OFO officials [REDACTED] [REDACTED] [REDACTED], Todd Hoffman; CBP Border Patrol official [REDACTED]; [REDACTED]; CBP AMO official [REDACTED]	Summary of various teleconferences and email communications related to CBP's actions to comply with the Court's July 2, 2020 order.	ACP/WPP	Description and content of confidential communications from July 30, 2020 and July 31, 2020, by and between CBP attorneys, the Director, and CBP OIT subject matter experts. Contains the thought process and description of communications of all participants regarding actions to comply with the Court's orders.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Acosta declaration	12	24	7/30/2020-7/31/2020	The Director; CBP Attorneys M. Bennett Courey, [REDACTED]; CBP OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin; CBP OFO officials [REDACTED]; [REDACTED]; CBP Border Patrol official [REDACTED]; CBP AMO official [REDACTED]	Summary of teleconferences and communications related to CBP's actions to comply with the Court's July 29, 2020 limited inquiry order.	WPP	Contains the thought process, recommendations, and description of communications of between CBP OIT and the Director, regarding the information that the Director previously relied upon in his prior declaration.
Acosta declaration	13	27	8/10/2020	The Director; CBP attorneys [REDACTED] (the conference call also included: CBO OIT officials Valerie Isbell, Jim McLaughlin, [REDACTED]; CBP OFO officials [REDACTED]	Summary of confidential communications between CBP attorneys and the Director, as well as OIT and OFO officials, regarding a the former Deputy Executive Assistant Commissioner's declaration, filed on May 21, 2020.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys and the Director as well as OIT and OFO officials, including CBP counsel's advice. Contains the thought process and description of communications between the Director and CBP attorneys, including legal advice
Acosta declaration	13	28	7/30/2020-9/4/2020	The Director; CBP OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]; CBP attorneys [REDACTED]	Summary of a series of confidential communications in June 2020 between OIT officials and CBP attorneys, regarding the sensitivity of TECS codes in the Administrative Record.	WPP	Contains the thought process and description of confidential communications between CBP OIT officials and the Director, in preparation for court filings in this litigation
Acosta declaration	14	29	6/13/2020-6/17/2020	The Director; CBP OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]; CBP attorneys [REDACTED]	Summary of a series of confidential communications in June 2020 between OIT officials and CBP attorneys, regarding the sensitivity of TECS codes in the Administrative Record.	ACP/WPP	Description and content of confidential communications, by and between CBP attorneys and subject matter experts within CBP OIT. Contains the thought process and description of communications between these participants.
Acosta declaration	14	30	7/29/2020-9/4/2020	The Director; CBP attorneys Bennett Courey, [REDACTED]; CBP OFO officials [REDACTED]; [REDACTED]; and CBP OIT officials Valerie Isbell, [REDACTED]	Summary of confidential communications from July 29, 2020 to September 4, 2020, between CBP OIT officials and CBP attorneys, regarding sensitivity level of TECS codes in the Administrative Record in response to the Court's order.	ACP/WPP	Description and content of confidential communications by and between CBP attorneys, the Director, and subject matter experts within CBP OIT. Contains the thought process and description of communications between the CBP OIT officials, CBP attorneys, and the Director.
Acosta declaration	Appendix	NA	NA	NA	NA	LEP	law enforcement investigative techniques and procedures related to vetting of TTP applicants; See DHS GLL 56, described in Wagner Declaration 5/21/20 ECF 55-2

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Perez Declaration	2	Para. 5--First Sentence	7/13/2020-7/27/2020	CBP attorneys, [REDACTED] [REDACTED]; CBP OFO officials Pete Acosta, [REDACTED], Donald Conroy, [REDACTED] and OIT officials Valerie Isbell, [REDACTED] Jim McLaughlin, [REDACTED]; Deputy Chief of Staff for the Commissioner [REDACTED]; U.S. Border Patrol official [REDACTED]	Summary of various email and telephonic communications, conducted to prepare for CBP's response to Plaintiffs' brief and address Plaintiffs' assertions contained therein, discussing CBP's access to various domestic jurisdictions' DMV records through Nlets and CBP information sharing agreements.	ACP/WPP	Confidential communications between CBP counsel and OFO and OIT clients. These communications sought operational information and included legal advice regarding how the Plaintiffs' assertions needed to be addressed and what factual inquiries were necessary. Involves inquiries by counsel and information gathered by counsel to prepare a response to the Plaintiffs' brief.
Perez Declaration	2	Para. 5--Second Sentence	7/13/2020-8/5/2020	CBP attorneys [REDACTED] [REDACTED]; CBP OFO officials Pete Acosta, [REDACTED], Donald Conroy, [REDACTED] and OIT officials Valerie Isbell, [REDACTED] Jim McLaughlin, [REDACTED]; Deputy Chief of Staff for the Commissioner [REDACTED]; Border Patrol official [REDACTED]	Summary of various email communications related to CBP's access to domestic jurisdictions' DMV records through Nlets and CBP information sharing agreements.	ACP/WPP	Involves attorney-client communications between CBP counsel and OFO and OIT clients regarding CBP's response to Plaintiffs' brief, including inquiries to address Plaintiffs' assertions regarding CBP's access to DMV information in other jurisdictions. Involves information gathered by CBP counsel to respond to Plaintiffs' brief.
Perez Declaration	3	Para. 5--Third Sentence	8/31/2020; 9/4/2020	CBP Attorneys Scott Falk, Bennett Courey, [REDACTED] and the Deputy Commissioner Robert Perez	Contents of Deputy Commissioner's supplemental declaration	ACP/WPP	Includes communications between CBP counsel and the Deputy Commissioner regarding what CBP needed to do to comply with the Court's orders to include creation of drafts of the Deputy Commissioner's supplemental declaration.

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Perez Declaration	3 to 4	Para. 6--First Sentence	7/13/2020-8/5/2020	CBP attorneys [REDACTED] [REDACTED]; CBP OFO officials Pete Acosta, [REDACTED], Donald Conroy, [REDACTED] and OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]; Deputy Chief of Staff for the Commissioner [REDACTED]; Border Patrol Official [REDACTED]; Deputy Commissioner Robert Perez; Chief of Staff Debbie Seguin; Deputy Chief of Staff [REDACTED]	summary of various email and telephone communications CBP access to various domestic jurisdictions' DMV records through Nlets and CBP information sharing agreements	ACP/WPP	Involves attorney-client communications between CBP counsel and operational clients pursuant to the preparation of Defendants' response to Plaintiffs' brief. Includes information that was gathered by CBP counsel to prepare filings in this litigation.
Perez Declaration	4	Para. 6--Third Sentence	7/13/2020-8/5/2020	CBP attorneys, Scott Falk, Bennett Courey, [REDACTED]; CBP OFO Pete Acosta, [REDACTED], Donald Conroy, [REDACTED] and OIT officials: Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]; Deputy Commissioner Robert Perez	summary of various telephone and email communications related to CBP information sharing agreements and potential connections to NY's Green Light Law	ACP/WPP	Involves attorney-client communications between CBP counsel and OFO regarding certain information sharing agreements and other discoveries pursuant to Defendants' preparation to respond to Plaintiffs' brief as well as information gathered pursuant to that preparation.
Perez Declaration	4 to 5	Para. 8--First Sentence to end of paragraph	6/13/2020 - 6/17/2020	CBP attorneys [REDACTED]; OFO Officials Pete Acosta, [REDACTED] and OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]; AMO official [REDACTED]; Border Patrol official [REDACTED]; Deputy Commissioner Robert Perez	Background into how the previous Perez Declaration came to include the information it did and the drafting process	ACP/WPP	Involves communications between CBP counsel and Government attorneys regarding what should be included in previous declarations (Perez and Acosta) at the time of their drafting and includes counsel's opinions and suggestions regarding language to be included in those declarations. Also includes attorney-client communications during the drafting of the original declarations (Perez and Acosta) to verify accuracy of statements.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Perez Declaration	5 to 6	Para. 9--Full Paragraph	3/16/2020 - 4/6/2020; 6/13/2020 - 6/17/2020	CBP attorneys [REDACTED]; OFO Officials Pete Acosta, [REDACTED]; and OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]; AMO official [REDACTED]; Border Patrol official [REDACTED]; Deputy Commissioner Robert Perez; John P. Wagner [only relevant to the period between 3/16/2020 -4/6/2020]	Background into how the previous Perez Declaration was reviewed for accuracy and the due diligence that was conducted during drafting based on summary assessment of various email and telephone communications related to the drafting and review of the Perez Declaration	ACP/WPP	Involves various attorney client communications between CBP counsel and client offices (OFO, OIT, AMO, BP) that were pursuant to ensuring the accuracy of the previous Perez Declaration. Includes preparatory work of counsel regarding other declarations that were filed in litigation involving the Green Light Law.
Perez Declaration	6 to 7	Para. 10--First Sentence to end of paragraph	12/10/2019-2/19/2020	CBP attorneys Bennett Courey, [REDACTED] CBP [REDACTED]; OFO officials Todd Owen, [REDACTED] John Wagner, [REDACTED], Pete Acosta, Donald Conroy, [REDACTED] Todd Hoffman; and CBP OIT officials Phil Landfried, [REDACTED], Valerie Isbell, [REDACTED], Sonny BHAGOWALIA	Background based on summary of various communications on how the lack of access to other jurisdictions' DMV data was uncovered and background into operators' perspective in light of inquiries made after the TTP decision	ACP/WPP/DPP	Involves attorney client communications between CBP counsel and client offices related to the preparation of the original Perez Declaration. Includes materials and information that CBP counsel gathered and relied on in drafting the previous Perez Declaration. Provides inquiries from DHS after the TTP Decision, which implicitly includes opinions and suggestions from Departmental staff on information gathered and clarification sought after the decision was made. Also includes personal opinions and perspectives of CBP staff in responding to those inquiries and their perspective on what was being requested.
Perez Declaration	7	Para. 11--Full Paragraph	6/17/2020	CBP attorneys [REDACTED]; Deputy Commissioner Robert Perez; Deputy Chief of Staff [REDACTED].	How the previous Perez Declaration was reviewed for accuracy and how language came to be included in that declaration.	ACP/WPP	Involves attorney client communications between CBP counsel and OFO and OIT that transpired during the drafting of the original Perez Declaration to inform drafting and verify accuracy. Further includes the process of CBP counsel in drafting the original Perez Declaration.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Perez Declaration	7 to 8	Para. 12--Fourth Sentence	2/21/2020; 3/6/2020; 4/24/2020; 5/6/2020	Acting Commissioner Mark Morgan, Deputy Commissioner Robert Perez; CBP attorneys Scott Falk, Bennett Courey, [REDACTED]; OIT official Valerie ISBELL; OFO officials Todd Owen, Pete Acosta, Thomas Overacker; Border Patrol official Raul Ortiz; Deputy Chief of Staff [REDACTED], Chief of Staff Debbie Seguin; DHS officials Chad Wolf, James McCament, John Gountanis, Tyler Houlton, Scott Erickson, Angie Alfonso-Royals, SOPDDS Cuccinelli; DHS Attorneys Chad Mizelle, Joseph Maher; Acting Director for ICE Matthew Albence	summary statement regarding Deputy Commissioner's knowledge of the effect and application of New York's Green Light Law and its amendments	ACP/WPP	phone calls between the Deputy Commissioner and operational offices and DHS, including conversations with CBP counsel regarding the operational effects of the Green Light Law, the potential legal effects of the amendments, and how to proceed in light of the litigation. Includes communications with counsel where counsel gathered information to include in filings in this litigation.
Perez Declaration	8	Para. 13--Full Paragraph	7/13/2020- 7/17/2020	Government attorneys; DHS attorney [REDACTED]; CBP attorneys [REDACTED]; CBP OFO officials Pete Acosta, [REDACTED], Donald Conroy, [REDACTED] and OIT officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED] Deputy Chief of Staff for the Commissioner [REDACTED]; Border Patrol official [REDACTED]	How the lack of access to other jurisdictions' DMV data was uncovered and immediate steps taken to address this revelation	ACP/WPP	Involves communications between CBP counsel and client offices related to the preparation of Defendants' brief, including legal advice from counsel surrounding allegations of Plaintiffs regarding CBP's data access. Includes information gathered pursuant to preparing Defendants' filings in this litigation. Includes communication between CBP counsel, DHS counsel, and Government attorneys, to discuss next steps in light of discoveries pursuant to Defendants' preparation to respond to Plaintiffs' brief.
Perez Declaration	9	Para. 15--Full Paragraph	6/11/2020 - 6/17/2020	CBP attorneys [REDACTED], OIT Officials Valerie Isbell, [REDACTED], Jim McLaughlin, [REDACTED]; and OFO officials Pete Acosta, [REDACTED]; Border Patrol Official [REDACTED]; AMO Official [REDACTED]	What informed the drafting of Statements B, C, and D in the previous Perez Declaration	ACP/WPP	Involves attorney client communications between CBP counsel and OFO, BP, AMO and OIT that transpired during the drafting of the original Perez Declaration to inform drafting and verify accuracy. Further includes information gathered and relied upon by CBP counsel in preparing the original Perez Declaration.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Perez Declaration	9 to 10	Para. 16--Full Paragraph	6/13/2020 - 6/17/2020	CBP attorneys [REDACTED] [REDACTED]; OIT Officials Valerie Isbell, [REDACTED] [REDACTED], Jim McLaughlin, [REDACTED] [REDACTED]; and OFO officials Pete Acosta, [REDACTED] [REDACTED]; Border Patrol Official [REDACTED]; AMO Official [REDACTED]	Review of the previous Perez Declaration for accuracy	ACP/WPP	Involves attorney client communications regarding the drafting of the original Perez declaration and assurances of accuracy as well as processes of CBP counsel in drafting the original Perez Declaration.
Perez Declaration	10	Para. 17--Full Paragraph	6/13/2020 - 6/17/2020	CBP attorneys [REDACTED] [REDACTED]; OIT officials Jim McLaughlin, [REDACTED] [REDACTED], Valerie Isbell; Commissioner's Deputy Chief of Staff [REDACTED] [REDACTED] Deputy Commissioner Robert Perez	How certain statements came to be included in the original Perez Declaration and reviews of the previous Perez Declaration for accuracy	ACP/WPP	Involves information regarding what was relied upon by CBP counsel during the drafting process of the original Perez Declaration as well as due diligence conducted to ensure accuracy of information included in Perez Declaration via attorney client communications between CBP counsel and operational clients.
Perez Declaration	10	Para. 18--Second Sentence	5/6/2020	CBP Attorneys Scott Falk, Bennett Courey, [REDACTED] [REDACTED]; Deputy Commissioner Robert Perez; OFO officials Pete Acosta, John P. Wagner, Thomas Overacker; OIT official Valerie Isbell; Deputy Chief of Staff [REDACTED] [REDACTED]; Chief of Staff Debbie Seguin; Border Patrol official Raul Ortiz	The April amendments to the Green Light Law and implications of the law for CBP	ACP/WPP	Involves communications between CBP counsel, the Deputy Commissioner, and operational offices regarding the effects and implications of the Green Light Law as amended including litigation concerns and legal advice.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Perez Declaration	11 to 12	Para. 20--Full Paragraph	07/13/2020-7/15/2020	CBP Attorneys [REDACTED]; CBP OFO officials [REDACTED] Pete Acosta, [REDACTED] OIT officials Valerie Isbell, [REDACTED]	Potential connections of the Green Light Law to certain information sharing agreements, including to address assertions of plaintiffs regarding CBP's access to DMV information in other domestic jurisdictions. These communications sought operational information and included legal advice regarding how the Plaintiffs' assertions needed to be addressed and what factual inquiries were necessary, particularly regarding access to California DMV data and local information sharing agreements not related to Nlets. Further includes communication to the Deputy Commissioner regarding this information and what needed to be included in his supplemental declaration. One specific attorney client communication is mentioned wherein information was provided to counsel pursuant to information gathering being conducted by counsel to response to Plaintiffs' brief.	ACP/WPP	Involves communications between CBP counsel and operational offices to prepare CBP's response to Plaintiffs' July 10, 2020 reply brief (Dkt. No. 79).

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Perez Declaration	12	Para. 21--Full Paragraph	7/13/2020-08/05/2020	CBP attorneys [REDACTED] and OFO officials John P. Wagner, [REDACTED] Deputy Chief of Staff [REDACTED]; OIT official Valerie Isbell	Potential connections of the Green Light Law to certain information sharing agreements, including to address certain agreements brought to counsel's attention involving information sharing. These communications sought operational information and included legal advice regarding how potential connections needed to be addressed and further necessary inquiries, particularly regarding local information sharing agreements not related to Nlets. Includes counsel's research and inquiries to prepare CBP's response to Plaintiffs' brief.	ACP/WPP	Involves communications between CBP counsel and operational offices to prepare CBP's response to Plaintiffs' brief.
Perez Declaration	13	Para. 22--First Sentence	7/17/2020	CBP attorneys [REDACTED]; OIT officials Valerie Isbell, [REDACTED], James McLaughlin; OFO officials [REDACTED], Pete Acosta, [REDACTED], Vernon Foret, [REDACTED]	CBP's access to California DMV information via Nlets; addressing CBP's data access to DMV information via Nlets. Contains information compiled and collected in preparation for filings to be made in court.	ACP/WPP	Involves communications between CBP counsel and operational offices to prepare CBP's response to Plaintiffs' brief.
Perez Declaration	13	Para 23--First Three Sentences	07/13/2020-08/05/2020	CBP attorneys Bennett Courey, [REDACTED]; OIT officials Valerie Isbell, [REDACTED], Jim [REDACTED], McLaughlin, [REDACTED]; OFO Officials [REDACTED], Pete Acosta, [REDACTED] Border Patrol official [REDACTED]	CBP's access to California DMV information as well as the importance of fluid information sharing and local information sharing agreements related to CLETS	ACP/WPP	Reflects research conducted in order to prepare a response to Plaintiffs' brief and steps CBP counsel took to prepare a response to the brief as well as legal recommendations from counsel to operational clients. Includes information collected by counsel pursuant to preparation for filings in instant litigation.

Document	Page No.	Paragraph/location	Date *	Participants *	Subject	Privilege	Privilege Description
Perez Declaration	14	Para 24--Second Sentence	7/17/2020	CBP Attorneys [REDACTED] [REDACTED]; DHS Attorney [REDACTED]; Government attorneys	Communication via teleconference between attorneys from CBP, DHS, and DOJ regarding newly discovered factual information to ensure candor to the court	ACP/WPP	Reflects communication between CBP attorney, DHS attorneys, and Government attorneys to ensure candor with the Court pursuant to information uncovered during Defendants' preparation of their response to Plaintiffs' brief.
<p>* Due to the summary nature of the redacted information, approximate date ranges of communications, instead of specific date for each log entry, are provided. In addition, because the majority of the redacted paragraphs summarize a large amount of email and telephone communications, the "Participants" column is a combined list of individuals who were involved in those communications, as opposed to separating "To" "From" and "CC " fields.</p>							